

HELEN F. DALTON & ASSOCIATES, P.C. ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415 Tel. (718) 263-9591 Fax. (718) 263-9598

April 18, 2023

Via ECF

The Honorable District Judge Kenneth M. Karas United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601

Re: <u>Sanchez v. Cosan Construction Corp., et al.</u> 22-CV-8420 (KMK)

Dear Judge Karas:

Our office represents the Plaintiffs in the above-referenced matter and submit this letter motion jointly with Defendants to respectfully request that the April 20, 2023 Status Conference be adjourned *sine die* in light of the parties' settlement.

The parties appeared for a Court-annexed mediation in late March and reached a settlement in this matter. As this case involves claims asserted under the Fair Labor Standards Act, the parties are now in the process of preparing the settlement documents for the Court's review and approval. We respectfully request 30 days to file the settlement documents. If this request is granted, the parties can file on or before May 18, 2023.

As such, we respectfully request an adjournment of the Status Conference as the parties are now focusing their efforts on preparing the settlement documents for the Court's review. This request will not affect any other dates or deadlines.

We thank the Court for its consideration and remain available to provide any additional information.

Respectfully submitted,

James O'Donnell James O'Donnell, Esq.